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Granted.

VIA ECF

The Honorable Paul A. Engelmayer United States District Court Southern District of New York 40 Foley Square New York, New York 10007 SO ORDERED.

PAUL A. ENGELMAY

August 20, 2020

United States District Judge

Re: Letter Motion for Approval of Redacted Filing in Reynolds Consumer Prods. LLC and Southwire Co., LLC v. Glencore AG et al., Case No. 16-cv-05955-PAE (S.D.N.Y.)

Dear Judge Engelmayer,

We write on behalf of Defendant Glencore Ltd. ("Glencore") in reference to Glencore's letter to the Court being filed today. This letter refers to deposition testimony that was produced on an Attorneys' Eyes Only basis subject to the Protective Order in the consolidated *Aluminum* matter (Consolidated Dkt., ECF No. 381), and which was docketed under seal as Exhibits C and D to Plaintiffs Reynolds Consumer Products LLC and Southwire Company, LLC's August 7, 2020 filing. (Reynolds/Southwire Dkt., ECF Nos. 179-3, 179-4.)

Accordingly, in order to prevent improper public disclosure of protected information, Glencore respectfully requests leave of the Court to file this letter under seal. Pursuant to Section (4)(B)(2) of Your Honor's Individual Rules and Practices in Civil Cases, Glencore is "(a) publicly fil[ing] the document[s] with the proposed redactions, and (b) electronically fil[ing] under seal a copy of the unredacted document with the proposed redactions highlighted" through the ECF system. We are available to discuss this request at the Court's convenience.

Respectfully submitted,

/s/ Jacques Semmelman Jacques Semmelman

cc: All counsel (via ECF)